

1 HONORABLE JOHN H. CHUN  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 FOUNDATION AGAINST  
10 INTOLERANCE AND RACISM, INC.,

11 Plaintiff,  
12 v.

13 STEVE WALKER, in his official capacity  
14 as Executive Director of the Washington  
State Housing Finance Commission,

15 Defendant.

No. 2:24-cv-01770-JHC

DECLARATION OF PAUL J.  
LAWRENCE IN SUPPORT OF  
DEFENDANT'S MOTION TO  
DISMISS

16 I, Paul J. Lawrence, declare as follows:

17 1. I am a partner at Pacifica Law Group LLP and attorney of record in the above-  
18 captioned matter for Defendant Steve Walker. I am over the age of 18, competent to testify, and  
19 make this declaration based on personal knowledge of the facts stated herein.

20 2. Attached as **Exhibit A** is a true and correct copy of the Covenant Homeownership  
21 Program Study, which was released by the National Fair Housing Alliance in March 2024. The  
22 Study is publicly available on the Washington State Housing Finance Commission's  
23 ("Commission") website at:

24 <https://www.wshfc.org/covenant/WSHFCWACHPFULLSTUDY32024.pdf>.

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27 DECLARATION OF PAUL J. LAWRENCE  
IN SUPPORT OF MOTION TO DISMISS - 1  
No. 2:24-cv-01770-JHC

3. Attached as **Exhibit B** is a true and correct copy of a document created by the Commission entitled “13 – Downpayment Programs,” which provides guidelines for the Commission’s downpayment assistance programs. This document is publicly available on the Commission’s website at: <https://www.wshfc.org/sf/13downpaymentprogramsHA1.pdf>.

4. Attached as **Exhibit C** is a true and correct copy of a Commission webpage entitled “Home Advantage Program FAQ,” which is available at: <https://www.wshfc.org/buyers/faq.htm>.

5. Attached as **Exhibit D** is true and correct copy of a Commission webpage entitled “House Key Opportunity Program,” which is available at: <https://www.wshfc.org/buyers/key.htm>.

6. Attached as **Exhibit E** is a true and correct copy of a document created by the Commission entitled “Covenant Homeownership Downpayment Assistance Program – Special Purpose Credit Program,” which is publicly available on the Commission’s website at: <https://www.wshfc.org/sf/CHOPManual2.pdf>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20<sup>th</sup> day of December, 2024.

s/ Paul J. Lawrence  
Paul J. Lawrence, WSBA #13557

DECLARATION OF PAUL J. LAWRENCE  
IN SUPPORT OF MOTION TO DISMISS - 2  
No. 2:24-cv-01770-JHC

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